

[illegible]

NO.10-5178

1. Does any prospective juror have any difficulty reading or understanding the English language?
2. Does any prospective juror have any difficulty or any impairment in hearing or seeing?
3. Does any prospective juror have any difficulty that makes it difficult for them to retain information presented to them?
4. Does any juror have any medical problem that would make it difficult for him/her to serve on this jury? Explain.
5. It is expected that this case will last approximately 5 days. Would serving on this jury cause any extreme personal hardship to anyone?
6. The plaintiff in this case is Rafia Grooms, who is the Administratrix for the Estate of Sontosh Clark. The defendant is Police Officer Britton Brown, who is a police officer with the Philadelphia Police Department. Is anyone acquainted with either one these individuals, directly or indirectly?

7. Does anyone know any of the attorneys in this case?
8. Do any of you know or are you acquainted with the judge, the Honorable Lawrence F. Stengel?
9. Do any of you know or are you acquainted with any of the following persons, who, in addition to the parties, may be called as witnesses in this case?
 - **Police Officer Arthur Lee**
 - **Police Officer Hector Maldonado**
 - **Police Officer Joseph Kelly**
 - **Police Officer Joseph Cahill**
 - **Police Officer Stephen Lupo**
 - **Police Officer James Edmiston**
 - **Police Officer John Hummel**
 - **Lt. David Merrick**
 - **Lt. John Prendergast**
 - **Lt. Steven Nolan**
 - **Ron Traenkle**
 - **James Gannalo**
 - **Dr. Richard Callery**
 - **Gary Barach**
 - **Dr. Samuel Gulino**
 - **Det David Baker**
 - **Gamal Emira**
 - **Lynn Haimowitz**
10. This case arises out of an incident that took place on March 16, 2009 at or near the 900 block of East Johnson Street in Philadelphia, PA. Do you know anything about this case or think that you know anything about it?
11. Has anyone ever served on a jury before?
 - a. If so, was it in state court or federal court?
 - b. In a civil or criminal case?
 - c. Did you render a verdict?
 - d. Was that verdict for plaintiff or defendant?
 - e. State the nature of the case and whether the juror would be willing to set aside whatever occurred in that particular matter, if chosen as a juror in this case.

12. Is there anything in the past experience of any prospective juror, which that juror believes, would have a favorable or adverse effect on their ability to sit as an impartial juror in this case?
13. Have you, or an immediate member of your family ever filed a lawsuit against another person for personal injury?
 - a. If yes, approximately how long ago did the incident occur?
 - b. Do you believe that it would influence you as a juror?
 - c. If your answer was yes, would you state your reasons.
14. Have you or any member of your family ever been arrested?
 - a. If yes, approximately how long ago did this occur;
 - b. Do you believe that it would influence you as a juror?
 - c. If your answer was yes, would you state your reasons.
15. Does any juror feel that they or a member of their family has ever been unfairly treated by a police officer ?
 - a. If yes, approximately how long ago did the incident occur;
 - b. Do you believe that it would influence you as a juror?
 - c. If your answer was yes, would you state your reasons.
16. Does anyone feel that the defendant is liable just because he has been named as a defendant in this lawsuit?
17. Does anyone feel or believe that a plaintiff has a right to recover damages or money from a defendant simply because she has brought a lawsuit and alleges injuries?
18. Have you or anyone in your family ever brought a claim or lawsuit against, or had any negative involvement with the City of Philadelphia and/or its agent, servants and/or employees?
19. Do any of you know of any reason why you think that you could not sit in this case and render a just, fair, honest and impartial verdict?
20. Because of anything you may have read in the newspapers, seen on television or heard on the radio or your personal experience regarding the Philadelphia Police Department and its officers, have any of you formed an opinion or feeling that would make it difficult for you to decide this case in favor of Officer Britton Brown, if the evidence justified a verdict in their favor?

Respectfully Submitted,

BY:

/s/ Armando Brigandi
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